

## Eli's Hospice Insider

### Billing: Hospices Shoulder Heavy Claims Burden

#### **New drug reporting requirement is a killer.**

You need to be working with your facility partners to make sure drug reporting on your Medicare claims is right, or you'll risk noncompliance under new claims data reporting requirements.

The **Centers for Medicare & Medicaid Services** stuck to its April 1 claims reporting deadline for a slew of new data (see Eli's Hospice Insider, Vol. 7, No. 3). That includes "visit reporting for general inpatient care, reporting the facility NPI where the care was provided when not provided at the billing hospice facility, and reporting of infusion pumps and prescription drugs," CMS describes.

The drug reporting requirements apply to "all levels of care for all sites of service" for any drugs used for the palliation and management of the terminal illness and related conditions, CMS's **Wendy Tucker** confirmed in the March 5 Open Door Forum for home care providers.

This requirement is going to be incredibly difficult for hospice patients located in hospitals, said **Jennifer Handel with Hospice of Michigan** in the forum. CMS questions-and-answers based on the transmittal containing this requirement, CR 8358, only came out recently, Handel said. Thus, hospices didn't know they would have to report the drug data for their hospitalized patients.

"We have dozens and dozens of hospital contracts," Handel explained. "Unfortunately they all have their own billing processes." When contacting partner hospitals' billing departments to discuss the new requirement, "we found ... most of them are requiring contract amendments written to the contracts, they've stated that their IT departments are going to have to become involved to create a whole new set of reports to give them the data," she told CMS in the forum. "The billers that I've talked to in these hospitals have said, 'we don't have the NDCs for the non injectables, we don't have the HCPCs for the injectables,' they're not even positive that they can even do this."

**Bottom line:** "There's no way that they're going to have these things in place," Handel said of hospitals. "I know you want us to work with them, but ... they will not have this ready for April 1."

Handel asked if hospices can submit adjustments to claims later, after hospitals have worked up reports with the information and shared them. CMS officials declined to provide an immediate answer.

Handel is "very concerned hospitals won't contract with us any more to handle hospice patients," she told CMS. "They don't need us, but we need them."

"The reality is this is an extremely complicated part of 8358," she concluded.

#### **MACs Issue Q&A On Troubling Topic**

A new question-and-answer set provided by Medicare contractors may help you with the requirement. "Through a cooperative effort, the Home Health & Hospice (HH&H) Medicare Administrative Contractors have developed an extensive list of FAQs to assist hospice providers in implementing data reporting changes mandated by Change Request (CR) 8358," they say on posts to their sites. "Answers to the most common questions can be answered by this document, including when drugs must be reported, and how they are reported on a claim."

In fact, 30 of the 49 Q&As address drug reporting.

**For example:** You aren't on the hook for reporting drugs unrelated to the terminal illness. "Only report medications for

the palliation and management of the terminal illness and related conditions," the MACs report in one of the drug reporting Q&As (#34 on CGS, Q16 on Palmetto's). "Therefore, you will only report medications covered under the hospice benefit."

The Q&As also contain 11 questions on visit reporting, five questions on NPIs, and two general questions. See them at [www.cgsmedicare.com/hhh/education/faqs/COPE24969.html](http://www.cgsmedicare.com/hhh/education/faqs/COPE24969.html) or [www.palmettogba.com/palmetto/providers.nsf/ls/Jurisdiction11](http://www.palmettogba.com/palmetto/providers.nsf/ls/Jurisdiction11) Home Health and Hospice~9H3NHM8217?opendocument&utm\_source=J11HHHL&utm\_campaign=J11HHHLs&utm\_medium=email.

Note: CR 8358 is online at <http://cms.gov/Regulations-and-Guidance/Guidance/Transmittals/Downloads/R2864CP.pdf>.